

National Aeronautics and Space Administration
George C. Marshall Space Flight Center
Marshall Space Flight Center, AL 35812



December 4, 2009

Reply to Attn of:

LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/James R. Frees

SUBJECT: Approval for MSFC Employees with Senior Institutional or Project Responsibilities to Attend the National Space Club – Huntsville Chapter Reception on December 9th, 2009

In accordance with 5 C.F.R. 2635.204(g)(2) and (3), I make the following determination:

Certain MSFC employees with senior institutional or project responsibilities have been invited to attend the National Space Club – Huntsville Chapter Reception Wednesday, December 9th, 2009, from 5 to 7 p.m. at the U.S. Space & Rocket Center Davidson Center for Space Exploration. The reception is being held as a parallel activity with a Space Policy workshop at the University of Alabama in Huntsville.

The National Space Club – Huntsville Chapter was founded in 1985 to further the aims locally of the National Space Club. The National Space Club is the foremost entity devoted to fostering excellence in space activity through interaction between industry and government, and through a continuing program of educational support. Through its programs, activities, and awards, it works to promote space leadership and education.

This event will be a widely-attended gathering of NASA personnel, representatives of the aerospace industry, Congressional staff, academia, community leaders, and elected officials. The event is valued at \$40 per person and approximately 200 people have been invited to attend. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

Most of NSC's members are companies that are currently providing contractual services to NASA, or will seek to provide contractual services to NASA in the future.¹ Some MSFC personnel invited to attend this event presently, or may in the near future, have extensive involvement in matters relating to members of NSC in their pursuit to provide, or seek to

¹ See file for listing of NSC corporate membership.

provide, contractual services to NASA.² These personnel are similarly situated in that they each have senior institutional or project responsibilities that could significantly influence current or future contracts for a majority of the NSC's corporate members. Alternatively, they may have duties that could significantly affect the interests of the NSC itself.

I have determined that free attendance of these senior institutional and project leaders at the event is in the interests of the agency because it will further agency programs and operations. The attendance of these senior NASA employees at the event will help to raise NASA's profile with state and local business and governmental leaders, will contribute to community relations, and will support NASA's statutory mandate to disseminate information about its programs.

Given the purpose of the event, NASA's interest in it, the broad attendance anticipated, and the reasonable market value of the event, I have determined that the value to the agency in having these senior institutional and project leaders attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties.

Accordingly, NASA employees in the positions identified above may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests.

The National Space Club – Huntsville Chapter is not a lobbying organization and is not registered as such under the Lobbying Disclosure Act.

Questions about this determination may be addressed to Annette Metcalf Coffel at 256-544-0025.


James R. Frees
Acting Chief Counsel

² Center Director; Associate Center Director; Director, Office of Strategic Analysis and Communications; Deputy Director, Office of Strategic Analysis and Communications; Director, Office of Procurement; Deputy Director, Office of Procurement; Chief Counsel; Deputy Chief Counsel; Chief Financial Officer; Deputy Chief Financial Officer; Deputy Chief Financial Officer for Finance.